

THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

In re:

REHME CUSTOM DOORS &
LIGHTING, INC. D/B/A REHME
STEEL WINDOWS & DOORS,

Debtor.

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Case No. 22-50059
(Chapter 11)

DEBTOR'S EMERGENCY MOTION TO (A) CONTINUE HEARING ON POST-
PETITION FINANCING AND (B) ABATE HEARING ON CONFIRMATION

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE APPLICATION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21-DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21-DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

EMERGENCY RELIEF IS REQUESTED BY OCTOBER 12, 2022.

**TO THE HONORABLE DAVID R. JONES
UNITED STATES BANKRUPTCY CHIEF JUDGE:**

The Debtor, through counsel, respectfully states as follows:

CASE STATUS

1. The Debtor filed a voluntary petition for relief under chapter 11 subchapter v of the Bankruptcy Code on September 9, 2022.

2. The Debtor filed a proposed plan [DE 4] and an emergency motion for post-petition financing [DE 5] on September 11, 2022.

3. The Court has approved interim post-petition financing in the amount of \$250,000 following two separate hearing on September 12, 2022 and September 22, 2022.

4. The Debtor continues to operate in the ordinary course of business. The Debtor is current on its post-petition bills and all employees have been paid timely.

CREDITOR COMMUNICATIONS

5. The Debtor has been in discussions with creditors Frankel Homes, Jim Wetwiska and Michael Ramsey (all pre-petition litigation claims holders), Aubrey Thomas of the Office of the United States Trustee and Catherine Curtis, the subchapter V trustee.

6. Based on these discussions, the Debtor has identified areas of concern with both the proposed plan and post-petition financing that the Debtor intends to address.

7. The Debtor needs time to propose an amended plan and to modify the proposed terms of additional post-petition financing that may be needed.

8. Alongside this process, the Debtor continues to respond to informal requests for information from various parties and continues to provide information as it becomes available.

RELIEF REQUESTED

9. The Debtor asks that the final hearing on post-petition financing, currently set for Wednesday, October 12, 2022, be continued to a date in the latter half of the week of October 17,

2022 (*i.e.*, October 19, 2022 through October 21, 2022).

10. The Debtor asks that the hearing on confirmation, currently set for October 17, 2022, be abated until the Debtor files an amended plan and requests a new hearing date.

11. The Debtor conferred with Aubrey Thomas from the U.S. Trustee's Office and the subV trustee Catherine Curtis who both indicated that they were not opposed to the relief being sought.

Dated: October 10, 2022

Respectfully submitted,

By: **JONES MURRAY LLP**
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PROPOSED COUNSEL FOR DEBTOR

CERTIFICATE OF ACCURACY

I hereby certify that the facts and circumstances described in the above pleading giving rise to the expedited request for relief are true and correct to the best of my knowledge, information and belief.

/s/ Christopher R. Murray
Christopher R. Murray